

A person wearing a dark suit and white shirt is holding a large, crumpled brown paper bag on a wooden table. The bag is partially open, and the person's hands are visible. The background is dark and out of focus.

Anti-bribery & Corruption Policy

BATHCO conducts business with integrity, transparency, and compliance with applicable anti-bribery and corruption laws. This Policy applies to all employees, directors, officers, consultants, agents, contractors, and any third parties acting on behalf of the Company. It extends to all locations where the Company operates.

BATHCO

To this end, we have adopted the following policy.



Prohibited conduct

- **Bribery:** Offering, promising, giving, or accepting anything of value to improperly influence a business decision.
- **Facilitation Payments:** Small, unofficial payments made to expedite routine government actions.
- **Kickbacks:** The return of a portion of money exchanged in a business transaction as a reward for favorable treatment.
- **Gifts and Hospitality:** Providing or accepting gifts, entertainment, or hospitality beyond reasonable and legitimate business purposes.
- **Improper Donations and Sponsorships:** Contributions to charities or sponsorships used to disguise bribery or corrupt activities.



Responsibilities

- **Employees and Representatives:** Must read, understand, and comply with this Policy.
- **Management:** Responsible for promoting a culture of integrity and ensuring adherence to this Policy
- **Compliance Officer:** Oversees implementation, provides training, and investigates reports of violation.



Due Diligence

The Company conducts due diligence on third parties, including agents, suppliers, and joint venture partners, to mitigate corruption risks.



Consequences of Non-Compliance

Violations of this Policy may result in disciplinary action, including termination of employment or contract, and legal consequences in accordance with applicable laws.



Reporting Violations

Employees and third parties are encouraged to report suspected violations through the Company's designated reporting channels. Reports can be made anonymously and will be treated confidentially.



This Policy is subject to periodic review and updates to ensure continued effectiveness and compliance with evolving legal requirements.